STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
LARRY J. WILSON, DIRECTOR

January 29, 1990

Mr. E.D. Forslund
Vice President
Interstate Power Company
P.O. Box 769
Dubuque, Iowa 52004

Subject: M.L. Kapp Station
Steam Generator Unit 2
Supplemental Permit 78-A-157-S

Dear Mr. Forslund:

In accordance with provisions specified in subrule 567--22.3(5) of the Iowa Administrative Code, this letter represents a supplement to permit 78-A-157. The permit is revised as noted below.

ADDITIONAL CONDITIONS

Condition 1 -- Allowable Emission Rate

The allowable sulfur dioxide emission rate for steam generator Unit 2 is 4.3 pounds per million Btu of heat input, 3-hour rolling average.

If it is determined that gas conditioning is not necessary in Unit 2, compliance with the permit emission limit above shall be achieved no later than July 1, 1990.

If it is determined that gas conditioning is necessary in Unit 2, compliance with the permit emission limit above shall be achieved no later than February 1, 1991.

Condition 2 -- Emissions Monitoring Equipment

The permittee shall install, calibrate, maintain, and operate continuous emission monitoring (CEM) systems for the measurement of the sulfur dioxide and oxygen (or carbon dioxide) emissions from Unit 2. Installation shall be completed by June 1, 1990, with a certification report submitted to the Department no later than July 15, 1990.

Compliance with the sulfur dioxide emission limit of this permit shall be continuously demonstrated by the permittee through the use of the CEM system.

Condition 3 -- Installation, Evaluation and Operation of the Contin Monitoring System

The procedures under 40 C.F.R. 60.13 shall be followed for installation, evaluation and operation of the CEMS.

a. The continuous monitoring system shall be operated in accordance with procedures under Performance 2 an 3 of 40 C.F.R. Part 60, Appendix B.

b. Quarterly accuracy determinations and daily calibration drift tests shall be performed in accordance with Procedure 1 of 40 C.F.R. Part 60, Appendix F.

c. The span value of the CEM shall be 200 percent of the maximum estimated hourly potential sulfur dioxide emissions from the fuel combusted.

Condition 4 -- Record Keeping

The permittee shall maintain the following records in a manr suitable for inspection at the Clinton facility for a perioc of at least two years from the date of record. The permitte shall make such records available to the Department upor request:

a. The three-hour rolling average sulfur dioxide emissio rates measured by the CEM required by this permit.

b. Identification of the operating days for which sulfur dioxide emission data have not been obtained, includi reasons for not obtaining sufficient data and a description of corrective actions taken.

c. Identification of the times when emission data have been excluded from the calculation of average emissio rates and the reasons for excluding the data.

d. Identification of the times when the sulfur dioxide concentration exceeded the full span of the continuou monitoring system.

e. Description of any modifications or maintenance made the continuous monitoring system that could affect th the ability of the CEM to comply with 40 C.F.R. Part 60, Appendix B, Performance Specifications 2 and 3

f. Results of the daily continuous monitoring system drift tests and quarterly accuracy assessments conducted in accordance with 40 C.F.R. Part 60, Appendix F.

Condition 5 -- Excess Emissions

An incident of excess emissions of sulfur dioxide shall be reported to the Department in accordance with chapter 567--24 (455B) IAC. An incident of excess emissions is defined a: a three-hour period during which the average emission rate o: sulfur dioxide, as measured by the CEM, exceeds 4.3 pounds p million Btu heat input.

Condition 6 -- Reporting Requirements

The following operation, emissions and control reporting requirements of this condition shall begin the calendar quarter in which the CEM becomes operational, covering the entire quarter or portion thereof. This information shall be reported on the forms supplied by the Department.

a. The magnitude of excess emissions computed in accordance with Condition 4a, any conversion factor(s) used and the date and time of commencement and completion of each time period of excess emissions.

b. Specific identification of each period of excess emissions that occurs during startups and shutdowns of the affected facility. The nature and cause of any excess emission and the corrective action taken shall be reported.

c. The date and time identifying each period during which the CEM was inoperative except for zero and span check and the nature of the system repairs or adjustments.

d. When no excess emissions have occurred or the CEM has not been inoperative, repaired, or adjusted, such information shall be stated in the report.

e. The results of the quarterly accuracy assessments as required by 40 C.F.R. Part 60, Appendix F.

Condition 7 -- Monitor Availability

Operation of the continous monitoring system with valid data capture of less than 95% of the source operating time during any calendar quarter is considered a violation of the permit.

Condition 8 -- Notification Requirements

Notification of the schedule for the relative accuracy determination required in Performance Specification 2 shall be provided to the Department in writing not later than fifteen (15) days before the test is performed. Such notice shall include, at a minimum, the time, the place and the name of the person who will conduct the test. Unless specifically

waived by the Department, a pretest meeting shall be held no later that fifteen (15) days prior to conducting the compliance demonstration. A representative of the Department shall be permitted to witness the tests.

All other conditions of the permit remain the same.

Sincerely,

Michael Hayward

MICHAEL HAYWARD
AIR QUALITY SECTION
AIR QUALITY AND SOLID WASTE PROTECTION BUREAU

cc: F.O. 6